

EXHIBIT 12

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Firs Home Owners Association,

Plaintiff,

v.

City of SeaTac, a Municipal Corporation,

Defendant.

NO. 2:19-cv-01130-RSL

2nd AMENDED PLAINTIFF'S
RESPONSE TO DEFENDANT'S FIRST
INTERROGATORIES TO PLAINTIFF

PROPOUNDING PARTIES: City of SeaTac, a Municipal Corporation

RESPONDING PARTY: Firs Home-Owners Association

The Responding Parties sent responses to Defendant's First Interrogatories on December 4, 2019 and then amended them the first time with Supplemental Responses on January 8, 2020. Thus, this is the 2nd Amended Plaintiff's Response to Defendant's First Interrogatories to Plaintiff.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each member of the Firs Home Owners Association and include for each the country of birth and the date or dates each member lived at the Firs

the plaintiff is an intended beneficiary of the program or activity” and thus that part of the interrogatory is irrelevant.

Plaintiff further objects that the contention is irrelevant to the case because the Plaintiff did not plead any claims that require them to prove their status as an intended beneficiary of a federal program or activity.

1. SeaTac Riverton Heights Park.

2. The rest are a list of programs, but the Plaintiffs never alleged that they were an intended beneficiary of the program or activity.

3. Additional info also provided as part of the Initial Discovery Documents sent to the Defendants regarding Federal Funding.

INTERROGATORY NO. 7: Identify other similarly situated persons or entities who, since 2000, were treated differently than the plaintiff by the City of SeaTac during the review of a mobile home park relocation plan pursuant to SMC § 15.465.600.H, and for each describe in detail how the similarly situated person or entity was treated differently.

RESPONSE

The Washington Department of Commerce Manufactured/Mobile Housing Community Closures list indicates that no other mobile home park has been closed in SeaTac that would be subject to a review of a mobile home park relocation plan pursuant to SMC § 15.465.600.H.

INTERROGATORY NO. 8: Describe in detail all statistical evidence that you contend supports your allegation that defendant City of SeaTac's "affirmative efforts on behalf of the landlord to expedite the closure of the Firs Mobile Home Park" has or had an adverse disproportionate effect or impact on "the predominately Latino/Hispanic, non-English-

See deletion above. On March 9, 2019, the water service to some or all of the Park was disconnected. See Firs Facebook Group, page 000311-000313.

Additionally, the City of SeaTac is in possession, custody and control of information, documentation and/or records of communication about their "unlawful intimidation and coercion campaign."

I, Luis Moreno, declare:

I am the President of the Firs Home Owners Association, the plaintiff Firs Homeowners Association in the above-entitled lawsuit to whom these interrogatories are addressed. I have read the initial answers and supplements to the interrogatories, know the contents thereof, and believe the same to be true.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed on the _____ day of February 2020, at _____, Washington.

Luis Moreno

ATTORNEY CERTIFICATION

Pursuant to FRCP 11, I certify that the initial and supplemental answers, responses and objections made in response to the Interrogatories and Requests for Production propounded by the City of SeaTac are made in good faith and in accordance with all applicable provisions of the Federal Rules of Civil Procedure, including but not limited to FRCP 26(g) and 33.

DATED: 3/2/2020

By: 

Vicente Omar Barraza, WSBA 43589
Attorney for Firs Home Owners Association